

November 13, 2009

**Via Electronic Submission**

Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, California 95814

Attn: Michael McCarthy

**Re: Notice of Public Availability of Modified Text and  
Availability of Additional Documents and/or Information  
On-Board Diagnostic System Requirements**

Dear Mike:

As you know, the Engine Manufacturers Association (“EMA”) has commented extensively on the proposed amendments to the on-board diagnostic systems for light- and medium-duty engines and vehicles and heavy-duty engines (“OBDII” and “HDOBD”) and new HDOBD enforcement provisions. These further comments are in response to the 15-day notice of availability of modified text and our comments are limited to the changes noted therein and to the additional documents referenced in the notice. EMA hereby incorporates by reference our written comments and oral testimony previously submitted to ARB on this rulemaking.

**Proposed 15-Day Modifications to Sections 1968.2, 1971.1 and 1971.5**

Vehicle Speed Sensors. EMA supports the language proposed in section 1971.1(g)(3.1.6) to clarify the monitoring requirements for vehicle speed information if the information is used for another OBD monitor for the reasons stated in the Summary of Proposed Modifications. In addition, we recommend ARB include language in the Final Statement of Reasons that clarifies ARB’s intent that transmission manufacturers for heavy-duty vehicles are not required to meet emission warranty, warranty defect reporting or service information requirements.

PTO Readiness. Both sections 1968.2(f)(17.6) and 1971.1(g)(5.6) include changes regarding readiness handling during PTO device activation. For medium-duty engines and vehicles, manufacturers may use the existing approach or an alternative approach to PTO readiness. For heavy-duty engines, manufacturers are required, by 2013, to change readiness handling to the alternative approach. Although EMA originally recommended the alternative approach, we specifically recommended it as an alternative, and not as a requirement now or in the future. Even if it is true that PTO devices may be used more in the heavy-duty market than in the medium-duty, that alone does not justify requiring heavy-duty engines to use the alternative approach. Forcing all manufacturers to use the new approach, when some have no need or justification to do so, serves

only to unnecessarily increase costs without any clear benefit. ARB should delete the phrase "For 2010 though 2012 model year engines" from section 1971.1(g)(5.6.2) and instead allow the alternative approach to be a true "alternative."

Specifications for Incrementing. In section 1971.1(d)(4.32.)(E), ARB has proposed that heavy-duty engine manufacturers may use the criteria for denominator incrementing found in the OBDII requirements as an alternative to those in section 1971.1. EMA supports that change.

Incrementing for Components that Experience Infrequent Regeneration. In section 1971.1(d)(4.3.2)(G), ARB has proposed new criteria for incrementing denominators for components that experience infrequent regeneration events. Until 2013, however, manufacturers also may request use of the existing or alternate criteria for incrementing. EMA supports the option to request use of alternate criteria for incrementing.

Enforcement Regulation. ARB has clarified that, upon election to conduct a recall within 45 days of receiving notice, manufacturers have an additional 45 days to submit a recall plan for approval. EMA supports this clarification.

#### **Guidelines for HDOBD Certification Data (Mail-Out #MSC 09-22)**

CAL ID/CVN. ARB indicates that engine serial number (ESN) is required to be reported in the CAL ID/CVN table. ARB should understand and be aware that engine manufacturers will submit approximately the first ESN that corresponds to the particular engine calibration being reported. In addition, when manufacturers submit CAL ID/CVN reports for service calibrations, the ESN would be shown as "Not available."

Appendix F of the Guidelines also requires reporting of "Module ID/Address" in hexadecimal format, showing examples of a single 4-digit value that apply only to 11-bit CAN messaging under SAE J1979. Engine manufacturers believe that 2 hexadecimal digits will be used to report source addresses when 29-bit messaging is used. Network segment device addresses (or source addresses) are 2 hexadecimal digits for systems that use 29-bit identifier CAN messages for diagnostic communication, regardless of whether J1939-73 or J1979 messages are used, and typically will be provided as the network address in the Module ID/Address column, when CAL-ID and CVN values are reported using SAE J1939-73 messages. Inclusion of some 29-bit addressing examples may be a useful clarification of Appendix F in any future revision of Mail-Out #MSC 09-22.

Rate-Based Data Reporting. The Guidelines require manufacturers to complete all fields of the template and prohibit them from using the abbreviation "NA." Specifically, the Guidelines state, "Manufacturers are required to fill in all fields in this template; the abbreviation NA shall not be used in this template." ARB must clarify what, if any, indication is to be used in a field when the monitor is not applicable (for example, when a particular control system is not part of the certified system). We understand that it is ARB's intent that any unused fields may and should be left blank.



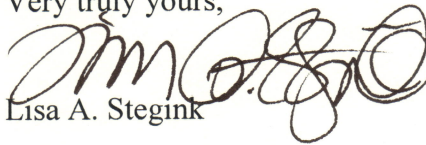
Clerk of the Board  
November 13, 2009  
Page 3 of 3

Thus, the Guidelines should be revised to delete the phrase "Manufacturers are required to fill in all fields of this template;" or ARB should otherwise clarify its intent.

Attachment G. HDOBD Diesel Monitoring Requirements Checklist. The headings for the comprehensive component monitoring section of the checklist are slightly different from the OBDII checklist headings (which also include "Functional 1," "Functional 2," and "Other Functional"). Particularly for those manufacturers who certify products in both the light/medium- and heavy-duty categories, the goal is to be able to use a common checklist for both OBDII and HDOBD to simplify referencing and reporting. EMA encourages ARB to allow alignment of the OBDII and HDOBD checklists to the extent appropriate.

Please do not hesitate to contact EMA if you have any questions or need further information on the foregoing.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Lisa A. Stegink', with a stylized, cursive flourish extending to the right.

Lisa A. Stegink